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Attorneys for Defendants
C. R. Bard, Inc. and
Bard Peripheral Vascular, Inc.

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

IN RE: Bard IVC Filters Products Liability
 Litigation,

No. 2:15-MD-02641-DGC

This Document Relates to:
 Debra Tinlin, et al. v. C. R. Bard, Inc., et al.
 CV-16-00263-PHX-DGC

**DEFENDANTS' NOTICE OF
 LODGING UNDER SEAL
 CERTAIN EXHIBITS IN
 SUPPORT OF BARD'S
 RESPONSE IN OPPOSITION TO
 PLAINTIFFS' SUPPLEMENT TO
 MOTION *IN LIMINE* NO. 2:
 VENA CAVA SIZE**

Defendants C. R. Bard, Inc. and Bard Peripheral Vascular, Inc. (collectively "Bard"), pursuant to the Stipulated Protective Order (Doc. 269), Federal Rule of Civil Procedure 26(c)(1)(G), and Local Civil Rule 5.6 file this notice of lodging under seal certain exhibits attached in support of Bard's Response in Opposition to Plaintiffs' Supplement to Motion *in Limine* No. 2: Vena Cava Size. These exhibits contain certain

1 Plaintiffs' personal healthcare information that is protected under HIPAA and confidential
 2 under the Stipulated Protective Order. Defendants have notified Plaintiffs of their intent to
 3 file this Notice of Lodging. Because the documents lodged under seal only relate to
 4 Plaintiffs' personal healthcare information, Defendants note that it is Plaintiffs' burden to
 5 file a motion to seal. A list of the Exhibits sought to be sealed are attached hereto as
 6 Exhibit A.

7 RESPECTFULLY SUBMITTED this 22nd day of April, 2019.

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20 **Attorneys for Defendants C. R. Bard, Inc. and**
 21 **Bard Peripheral Vascular, Inc.**

EXHIBIT A

DOCUMENTS PROPOSED TO BE FILED UNDER SEAL

Defendants request they be permitted to file under seal the following documents:

Exhibit A: Excerpts from January 30, 2019 Deposition of Dr. McMeeking

Exhibit B: Excerpts from January 7, 2019 Deposition of Dr. Hurst

Exhibit C: Excerpts from March 29, 2019 Deposition of Dr. Morris